PAUL, WEISS, RIFKIND, WHARTON & GARRISON

1615 L STREET, NW

WASHINGTON, DC 20036-5694

TELEPHONE (202) 223-7300 FACSIMILF (202) 223-7420

EX PARTE OR LATE FILED

JEFFREY H. OLSON COMMUNICATIONS COUNSEL (202) 223-7326

1285 AVENUE OF THE AMERICAS NEW YORK, NY 10019-6064

199. BOULEVARD SAINT-GERMAIN 75007 PARIS, FRANCE

AKASAKA TWIN TOWER 17-22. AKASAKA 2-CHOME MINATO-KU, TOKYO 107, JAPAN

SUITE 1910 SCITE TOWER 22 JIANGUOMENWAI DAJIE BELLING LOOGO4 PEOPLE'S REPUBLIC OF CHINA

LOTH FLOOR, HONG KONG CLUB BUILDING 3A CHATER ROAD CENTRAL, HONG KONG

May 8, 1998

RECEIVED

MAY - 8 1998

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

Via Hand Delivery

OCKET FILE COPY ORIGINAL Magalie Roman-Salas, Secretary Federal Communications Commission 1919 M Street, N.W. Room 222

Washington, D.C. 20554

Ex Parte Notice, File Nos. 48-SAT-P/LA-97. Re:

89-SAT-AMEND-97, and RM No. 9147

Dear Ms. Salas:

On May 7, 1998, Denis Rouffet, Hélène Fauve, Guy Christiansen, and Christine Vadier of SkyBridge; Jeffrey H. Olson and Diane C. Gaylor of Paul, Weiss, Rifkind, Wharton & Garrison; George Kizer of Alcatel Network Systems; and Jeffrey Krauss, a consultant to SkyBridge, met with the individuals on the attached list for the purpose of discussing issues raised in the above-captioned proceedings. The discussion focused on the ability of SkyBridge to share spectrum on a noninterference basis with geostationary satellite systems and terrestrial microwave systems. The attached handouts were distributed at the meeting.

In accordance with Section 1.1206(b)(2) of the Commission's Rules, 47 C.F.R. § 1.1206(b)(2) (1997), we are submitting an original and three copies of this notice.

> No. of Copies rec'd LIST ABCDE

Please contact the undersigned if you have any questions.

Respectfully submitted,

Jeffrey H. Olson

Attachments

cc: See attached list.

3

PAUL, WEISS, RIFKIND, WHARTON & GARRISON Magalie Roman-Salas, Secretary

May 8, 1998

Sasha Field International Bureau

Julie Garcia International Bureau

Kimberly M. Baum International Bureau

Julius P. Knapp Office of Engineering and Technology

Harold Ng International Bureau

Edward R. Jacobs Wireless Telecommunications Bureau

Charles Iseman
Office of Engineering and Technology

Thomas P. Stanley Wireless Telecommunications Bureau

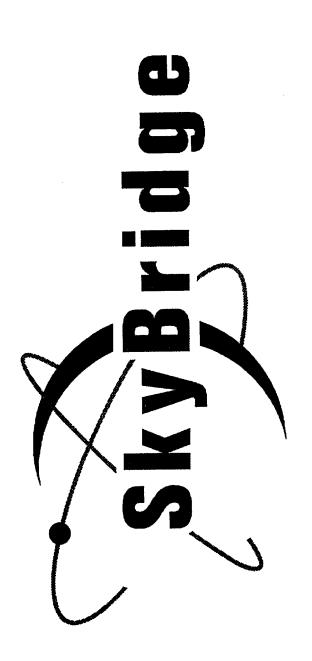
Thomas Derenge Office of Engineering and Technology

Donald Draper Campbell
Office of Engineering and Technology

Bruno Pattan
Office of Engineering and Technology

Maureen C. McLaughlin International Bureau

Cecily C. Holiday International Bureau

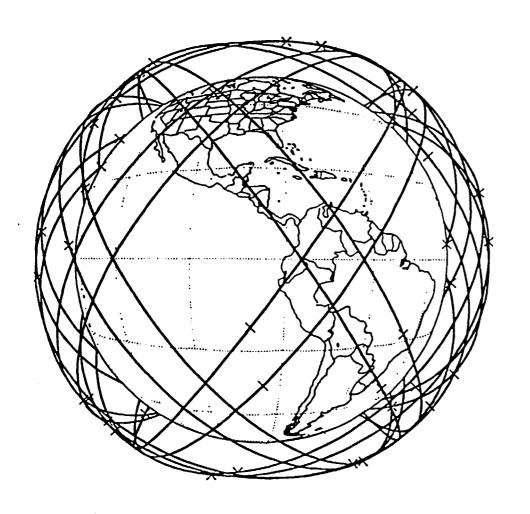


Presentation for OET May 7, 1998

The SkyBridge System

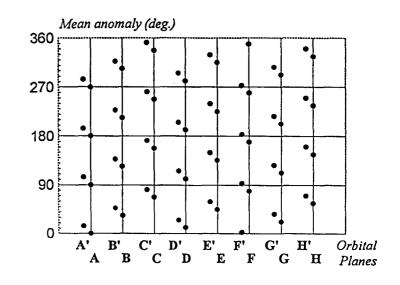
- 64 Satellites
- 2 Identical 32-Satellite Sub-Constellations
- Low Earth Orbit
- Ku-Band Operation
- FSS Broadband Interactive Services
- Protects Existing GEO and Terrestrial Systems

SkyBridge Constellation

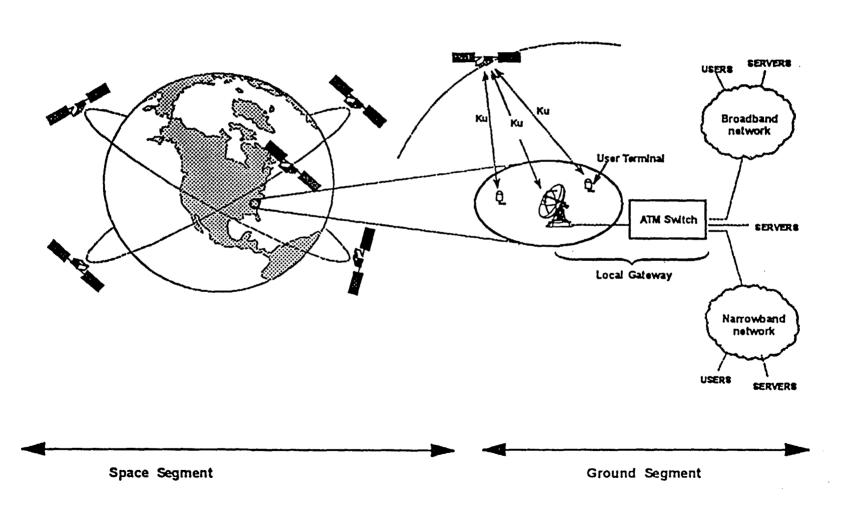


32 Satellite Sub-constellation		
Number of planes	8	
Satellites per plane	4	
Inclination	55°	
Altitude	1457 km	
Orbit period	115 min.	

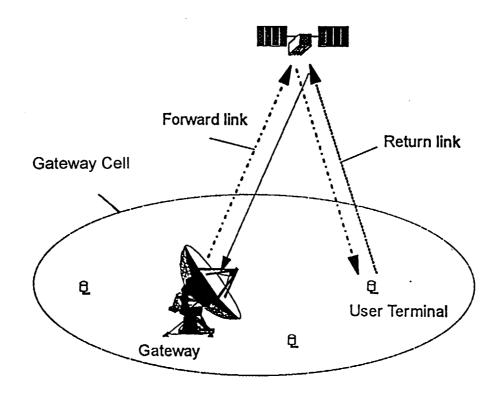
Relative Phasing between 2 Sub-constellations		
Ascending node spacing	-10°	
Mean anomaly spacing	+14°	



SkyBridge System Overview



SkyBridge Communications Links



- One Gateway is located in each Gateway Cell.
- Each Gateway serves the User Terminals within its Gateway Cell.
- ♦ SkyBridge does not employ Inter-Satellite Links.

SkyBridge Spot-Beams

Spot-Beam Size:

350 km radius

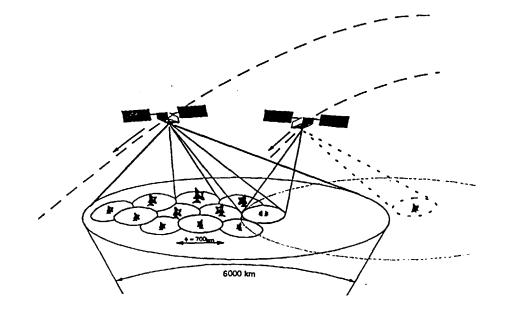
Maximum No. of Beams

per Satellite:

45¹/

Satellite Coverage:

3000 km radius

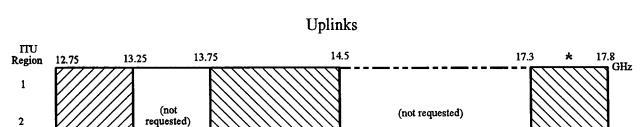


Spot-Beam Operation

- Spot-beam coverage area on ground remains fixed as the Satellite moves.
- Each beam covers one Gateway Cell, carrying the traffic of the User Terminals within the Gateway Cell.
- As the Satellite moves out of visibility, Gateway traffic is handed-off to another Satellite.

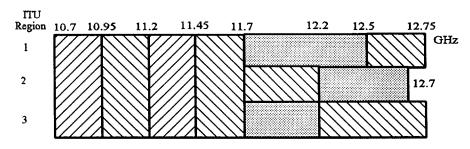
Most of the time, no more than 6 beams will operate at any given frequency and polarization.

SkyBridge Band Plan



3

Downlinks



Planned FSS (Appendix 30B)

Unplanned FSS (Articles 11 and 13)

Planned BSS (Appendices 30 and 30A)

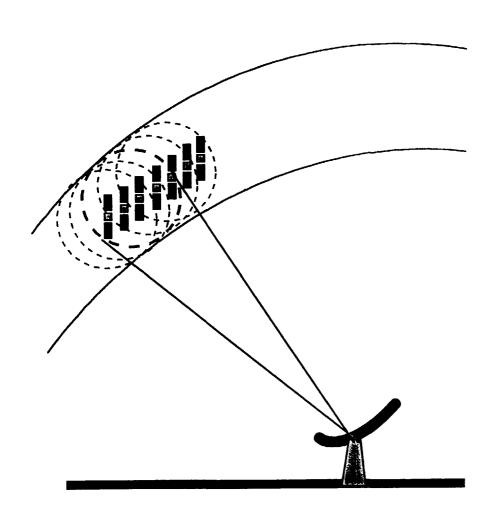
* Feeder Links for BSS per Appendix 30A

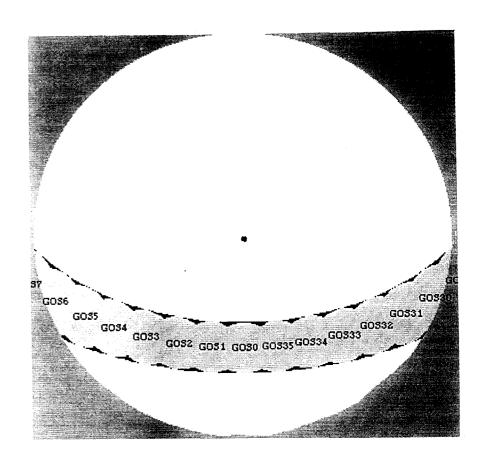
SkyBridge Requirement: 1.05 GHz for uplink and downlink

Protecting GEO Systems

- Concept -

Due to the directivity of GEO systems, most of the sky is unused.





GEO Arc as Seen from a Point on Earth

Protection Criteria

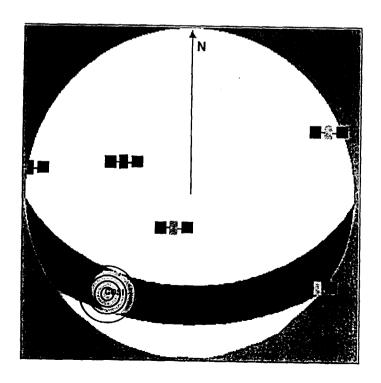
GEO Systems are protected if:

- No degradation in quality of service or availability of GEO systems
- No operational constraints for the GEO operator

Standard LEO Constellation

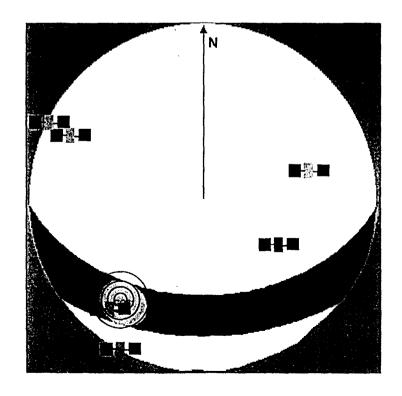
Long Term Situation

- Situation most of the time
- Satellites far apart
- Similar to standard GEO coordination



Short Term Situation

- Infrequent and short events
- LEO satellite in alignment with GEO satellite
- Problem for both systems <u>if</u> <u>interference-avoidance</u> <u>techniques not employed</u>



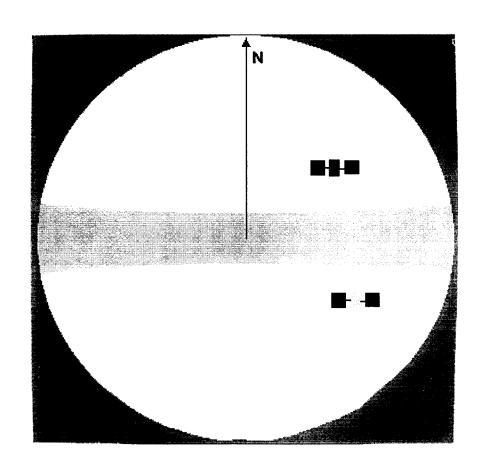
Interference-Avoidance Techniques Employed by SkyBridge to Protect GEO Systems

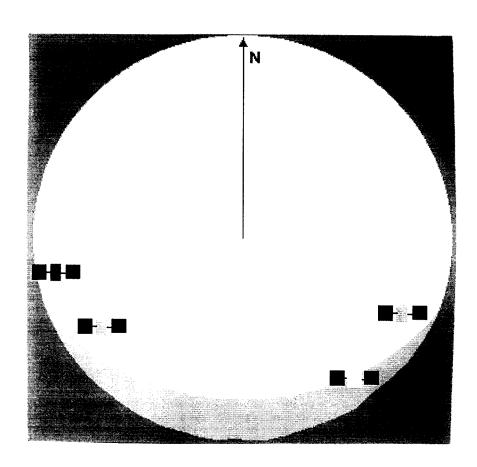
- Shut down of spot beams to avoid SkyBridge main lobe transmissions into main lobe of GEO antennas
- Choice of specific constellation to ensure continuous service
- Choice of specific waveform, including spreading, to limit PFD

Implementation of Spot-beam Shut Down

- When a spot beam is shut down, its traffic is handed to another Satellite.
- ♦ The SkyBridge constellation is designed so that there is always a usable Satellite to which traffic can be handed at least 10° away from the GEO arc as seen by any earth station.

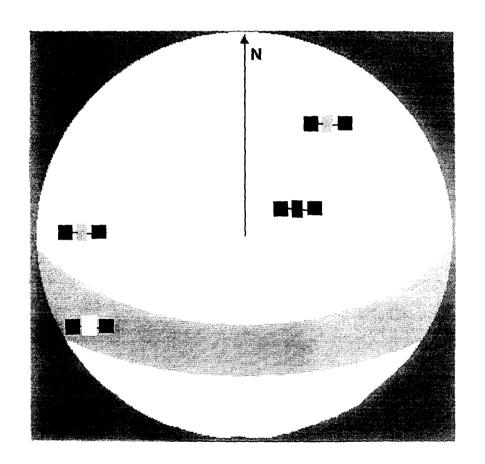
Fish-Eye Views of the Sky as Seen by a SkyBridge Earth Station

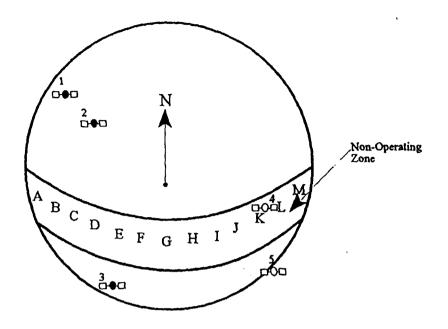




From Quito, Ecuador latitude = 0°

From Fairbanks, Alaska latitude = 65°





KEY TO GEOSTATIONARY ORBIT SATELLITES (GSO) VISIBLE FROM WASHINGTON, DC

Longitude			
Marker	East	West	Ku-band Satellite Examples
Α	340	20	Intelsat
В	330	30	Intelsat, Orion
С	320	40	Intelsat, PAS
D	310	50	Intelsat
E	300	60	South America, AMSC Feeder
F	290	70	SN2
G	280	80	GE2, SN3
H	270	90	Telstar 402, Gal 7, Gal 3/8
I	260	100	Gal 4, GE-1, Gstar IV, SN4
J	250	110	Aniks & Solidaridads
K	240	120	Morelos-2, SBS-5
L	230	130	GE-3
M	220	140	AMSC Feeder

From Washington, D.C. latitude = 39°

Protecting Fixed Service Systems

- Concept -

Protection Criteria

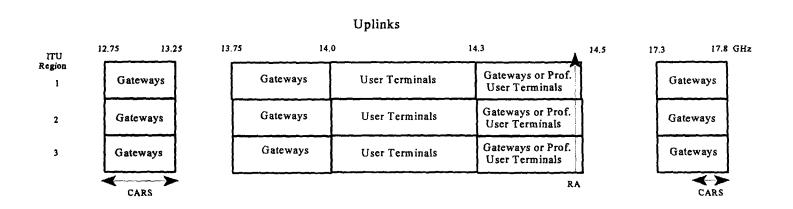
Fixed Service systems are protected if:

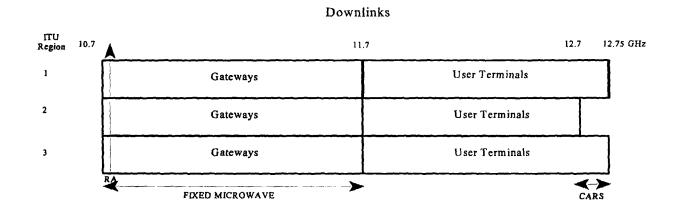
- No degradation in quality of service or availability of Fixed Service links
- No significant constraints on future Fixed Service expansion

Techniques Employed by SkyBridge to Protect Fixed Service Systems

- Operate only Gateways in frequencies heavily used by Fixed Service systems
- Limited number of Gateways (30-40 in US)
- Use state-of-the-art antenna technology
- Use standard coordination techniques to site Gateways
- Employ specific waveform, including spreading, to limit PFD to well below requirements of 47 C.F.R. § 25.208(b)

Possible Frequency Usage





Example SkyBridge Analyses on Ability to Protect Fixed Service Systems

- Application, Appendix B Results of Computer Simulations
- Amendment, Appendix C Separation Distance Calculations
- Petition for Rulemaking Proposed Rules Protecting FS Systems
- Response to TIA Comments on Application



FREQUENCY RE-USE

With the Fixed Service

ALCATEL



Table of Contents

- SkyBridge proposed frequency plan
- Frequency re-use with FS systems on the terrestrial path
- Frequency re-use with FS systems on the downlink (slant path)